

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

NLD ROCHESTER LLC,

Plaintiff,

v.

23-CV-6058 DGL

440 LAKE AVENUE, LLC,

Defendant.

**AFFIDAVIT IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT FOR SUM
CERTAIN and MOTION FOR ATTORNEYS' FEES**

I, M. Kasey Ratliff, being duly sworn, state as follows:

1. I am a Shareholder with Winstead PC, Texas counsel to Plaintiff, NLD Rochester LLC, in the above-entitled action and I am familiar with the file, records and pleadings in this matter.
2. I submit this affidavit in support of NLD Rochester's motion for default judgment for a sum certain and motion for attorneys' fees in the above-entitled matter.
3. This action was filed on or about January 23, 2023.
4. But Winstead's involvement in this matter started in June 2022.
5. Throughout this time, I have kept accurate and contemporaneous time records of the hours spent on this matter, including, but not limited to, dates of services performed and tasks undertaken.
6. I have instructed, supervised, and ensured that all associates and employees of Winstead PC keep accurate and contemporaneous time records of the hours spent on this matter, including, but not limited to, dates of services performed and tasks undertaken.
7. Attached hereto as Exhibit A are the Time and Billing records of this matter. The time spent as was necessary on this matter to negotiate and later commence legal action on this matter.

8. The Time and Billing records show the type of services performed, by who, and when the services were performed (as in this affidavit, time is entered contemporaneously).
9. The total fees billed to NLD Rochester amount to \$12,200.04.
10. Upon information and belief, all time spent on this matter has been reasonable and any unreasonable time has been discounted appropriately as noted in Exhibit A.
11. I have been practicing complex commercial and real estate litigation for almost 20 years. Winstead PC has many locations, but Mr. Joeckel and I are located in Dallas, Texas.
12. My current hourly billing rate is \$675.
13. My rates are well within the range of fees charged by attorneys within this geographical area of comparable experience.
14. Mr. Matthew Joeckel has been practicing for approximately 4 years in commercial and real estate litigation.
15. Mr. Joeckel's hourly billing rate is \$465.
16. Mr. Joeckel's rates are well within the range of fees charged by attorneys within this geographical area of comparable experience.
17. All fees charged prior to commencement of the present action were required to analyze NLD Rochester's potential claims and put it in a position to commence suit for the monies owed.

Dated April 24, 2023


M. Kasey Ratliff, Esq.

Sworn to and subscribed before
Me this 24th day of April, 2023.



Notary Public



EXHIBIT A



2728 N. Harwood Street
Suite 500
Dallas, TX 75201
Tax I.D. #75-2404691

June 13, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110

Invoice #: 3107032
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through May 31, 2022:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
5/05/22	MKR	Review correspondence from Mr. Ledesma regarding dispute over rent with Seller; analyze relevant documents.	.70
5/10/22	MKR	Work session with M. Joeckel regarding demand letter pertaining to rent wrongfully retained by Seller.	.40
5/10/22	MJ	Review and analyze facts and supporting docs in preparation of drafting letter to Seller.	.90
5/11/22	MKR	Work session with M. Joeckel regarding demand letter; correspondence with Mr. Ledesma regarding same; revise draft demand letter.	.60
5/11/22	MJ	Prepare demand letter to 440 Lake Avenue LLC; review and analyze supporting documents; correspondence with client regarding the facts and the demand letter.	4.30
5/12/22	MKR	Final revisions to demand letter; work session with M. Joeckel regarding same.	.30
5/18/22	MJ	Correspondence from Seller regarding opposing counsel and demand.	.20
5/23/22	MKR	Review letter in response to demand letter.	.30
5/23/22	MJ	Receipt and review correspondence from 440 Lake Ave, LLC's counsel.	.20
5/24/22	MJ	Correspondence regarding facts of the dispute and the strategy.	.20
5/31/22	MJ	Receipt and review correspondence from client regarding status.	.10

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	2.30	630.00	1,449.00
MJ	Matt Joeckel	5.90	430.00	2,537.00

WINSTEAD PC | ATTORNEYS

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

June 13, 2022
Invoice #: 3107032

Init	Timekeeper	Hours	Rate	Total
	TOTALS	8.20		\$ 3,986.00

TOTAL PROFESSIONAL SERVICES \$ 3,986.00

Less 15% Discount \$ -597.90

NET PROFESSIONAL SERVICES: \$ 3,388.10

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	2.30	630.00	1,449.00
MJ	Matt Joeckel	5.90	430.00	2,537.00
	TOTALS	8.20		\$ 3,986.00

TOTAL THIS INVOICE \$ 3,388.10



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June 13, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110Invoice #: 3107032
Client #: 55203
Matter #: 300**REMITTANCE ADVICE****RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)**

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE**\$ 3,388.10**

Please return this advice with payment to:

WINSTEAD PC | ATTORNEYS
ATTN: Accounts Receivable
2728 N. Harwood St., Suite 500
Dallas, Texas 75201-1743**Wire Transfer Instructions: Client Retainer Account**Comerica Bank
Dallas, TX
Swift Code MNBDUS33
ABA# 111000753
Account # 1881293359
Credit: Winstead PC
Client Retainer Account
Reference: M. Kasey Ratliff
Client/Matter#: 55203.300**ACH TRANSFERS:**Must be sent in CTX Format with payment
detail by invoice number.Invoice payment detail may also be
submitted via fax or email:FAX: 214.745.5390
ATTN: Accounts Receivable
E-mail: accountsreceivable@winstead.com**TERMS: NET 30 DAYS*****Thank you!***
Your business is greatly appreciated.



2728 N. Harwood Street
Suite 500
Dallas, TX 75201
Tax I.D. #75-2404691

July 14, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110

Invoice #: 3114195
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through June 30, 2022:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
6/06/22	MKR	Review correspondence from Mr. Ledesma regarding new lawsuit; review lawsuit and deadline to file responsive pleading; correspondence with Mr. Ledesma regarding same.	.30
6/13/22	MKR	Various correspondence with opposing counsel regarding extension on responsive pleading deadline and potential settlement.	.30

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	.60	630.00	378.00
TOTALS		.60		\$ 378.00

TOTAL PROFESSIONAL SERVICES \$ 378.00

Less 15% Discount \$ -56.70

NET PROFESSIONAL SERVICES: \$ 321.30

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	.60	630.00	378.00
TOTALS		.60		\$ 378.00

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

July 14, 2022
Invoice #: 3114195

TOTAL THIS INVOICE

\$ 321.30



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July 14, 2022

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1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110Invoice #: 3114195
Client #: 55203
Matter #: 300**REMITTANCE ADVICE****RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)**

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE**\$ 321.30**

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WINSTEAD PC | ATTORNEYS
ATTN: Accounts Receivable
2728 N. Harwood St., Suite 500
Dallas, Texas 75201-1743**Wire Transfer Instructions: Invoice Payments**JPMORGAN CHASE BANK, N.A.
Swift Code CHASUS33XXX
ABA# 111000614
Account # 729508785
Credit: Winstead PC
Cash Receipts Account
Reference: M. Kasey Ratliff
Client/Matter#: 55203.300**ACH TRANSFERS:**

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Email: accountsreceivable@winstead.com**TERMS: NET 30 DAYS*****Thank you! Your Business is Greatly Appreciated.***



2728 N. Harwood Street
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August 16, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110

Invoice #: 3122455
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through July 31, 2022:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
7/12/22	MKR	Conference with opposing counsel regarding dispute over erroneously paid rent; conference with Mr. Ledesma regarding same.	.40
7/14/22	MKR	Draft correspondence to opposing counsel regarding dispute related to erroneously paid rent; correspondence with Mr. Ledesma regarding same.	.60
7/18/22	MKR	Correspondence with opposing counsel regarding dispute over erroneously paid rent; correspondence with Mr. Ledesma regarding same.	.40
7/19/22	MKR	Correspondence with opposing counsel regarding dispute; correspondence with Mr. Hidalgo regarding same; review correspondence with Speedway regarding same.	.30

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	1.70	630.00	1,071.00
TOTALS		1.70		\$ 1,071.00

TOTAL PROFESSIONAL SERVICES	\$ 1,071.00
Less 15% Discount	<u>\$ -160.65</u>
NET PROFESSIONAL SERVICES:	\$ 910.35

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

August 16, 2022
Invoice #: 3122455

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	1.70	630.00	1,071.00
TOTALS		1.70		\$ 1,071.00

TOTAL THIS INVOICE **\$ 910.35**



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August 16, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110Invoice #: 3122455
Client #: 55203
Matter #: 300**REMITTANCE ADVICE****RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)**

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE**\$ 910.35**

Please return this advice with payment to:

WINSTEAD PC | ATTORNEYS
ATTN: Accounts Receivable
2728 N. Harwood St., Suite 500
Dallas, Texas 75201-1743**Wire Transfer Instructions: Invoice Payments**JPMORGAN CHASE BANK, N.A.
Swift Code CHASUS33XXX
ABA# 111000614
Account # 729508785
Credit: Winstead PC
Cash Receipts Account
Reference: M. Kasey Ratliff
Client/Matter#: 55203.300**ACH TRANSFERS:**

Must be sent in CTX Format with payment detail by invoice number.

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Email: accountsreceivable@winstead.com**TERMS: NET 30 DAYS*****Thank you! Your Business is Greatly Appreciated.***



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September 15, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110

Invoice #: 3131348
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through August 31, 2022:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
8/03/22	MKR	Review letter from Speedway's counsel to Seller's counsel demanding transfer of erroneously paid rent; correspondence to Mr. Ledesma regarding same.	.30
8/17/22	MKR	Review correspondence from Seller's counsel to Speedway's counsel; correspondence with Mr. Ledesma regarding same.	.30

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	.60	630.00	378.00
TOTALS		.60		\$ 378.00

TOTAL PROFESSIONAL SERVICES \$ 378.00

Less 15% Discount \$ -56.70

NET PROFESSIONAL SERVICES: \$ 321.30

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	.60	630.00	378.00
TOTALS		.60		\$ 378.00

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

September 15, 2022
Invoice #: 3131348

TOTAL THIS INVOICE

\$ 321.30



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September 15, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110Invoice #: 3131348
Client #: 55203
Matter #: 300**REMITTANCE ADVICE****RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)**

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE**\$ 321.30**

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2728 N. Harwood Street
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December 21, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110

Invoice #: 3169233
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through November 30, 2022:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
11/03/22	MKR	Telephone conference with local counsel candidates regarding claims and parties; prepare correspondence to local counsel candidate regarding same.	.60
11/07/22	MKR	Correspondence with local counsel regarding case background and strategy.	.20
11/08/22	MKR	Correspondence with Mr. Ledesma and local counsel regarding status and strategy.	.20

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	1.00	630.00	630.00
TOTALS		1.00		\$ 630.00

TOTAL PROFESSIONAL SERVICES \$ 630.00

Less 15% Discount \$ -94.50

NET PROFESSIONAL SERVICES: \$ 535.50

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	1.00	630.00	630.00

WINSTEAD PC | ATTORNEYS

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

December 21, 2022
Invoice #: 3169233

Init	Timekeeper	Hours	Rate	Total
	TOTALS	1.00		\$ 630.00

TOTAL THIS INVOICE \$ 535.50



Austin | Charlotte | Dallas | Fort Worth | Houston | New York | San Antonio | The Woodlands

2728 N. Harwood Street
Suite 500
Dallas, TX 75201
Tax I.D. #75-2404691

December 21, 2022

HIDALGO, BEN
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE., SUITE 401
FORT WORTH, TX 76110

Invoice #: 3169233
Client #: 55203
Matter #: 300

REMITTANCE ADVICE

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE

\$ 535.50

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Dallas, Texas 75201-1743

Wire Transfer Instructions: Invoice Payments

JPMORGAN CHASE BANK, N.A.
Swift Code CHASUS33XXX
ABA# 111000614
Account # 729508785
Credit: Winstead PC
Cash Receipts Account
Reference: M. Kasey Ratliff
Client/Matter#: 55203.300

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FAX: 214.745.5390
ATTN: Accounts Receivable
Email: accountsreceivable@winstead.com

TERMS: NET 30 DAYS

Thank you! Your Business is Greatly Appreciated.



2728 N. Harwood Street
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Dallas, TX 75201
Tax I.D. #75-2404691

January 12, 2023

BEN HIDALGO
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE.
SUITE 401
FORT WORTH, TX 76110

Invoice #: 3175612
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through December 31, 2022:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
12/06/22	MJ	Correspondence with local counsel regarding complaint; brief review and analysis of New York law regarding available causes of action; begin preparation of complaint.	1.80
12/07/22	MKR	Strategy call with local counsel; provide update to Mr. Ledesma.	.50
12/07/22	MJ	Prepare complaint; conference with local counsel regarding introduction and case plan.	4.60
12/09/22	MJ	Conference regarding complaint to local counsel.	.20
12/16/22	MJ	Email correspondence with local counsel; review and revise Plaintiff's complaint.	.60
12/22/22	MJ	Email correspondence with local counsel regarding filing of lawsuit.	.20

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	.50	630.00	315.00
MJ	Matt Joeckel	7.40	430.00	3,182.00
TOTALS		7.90		\$ 3,497.00

TOTAL PROFESSIONAL SERVICES \$ 3,497.00

Less 15% Discount \$ -524.55

NET PROFESSIONAL SERVICES: \$ 2,972.45

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

January 12, 2023
Invoice #: 3175612

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	.50	630.00	315.00
MJ	Matt Joeckel	7.40	430.00	3,182.00
TOTALS		7.90		\$ 3,497.00

TOTAL THIS INVOICE **\$ 2,972.45**



Austin | Charlotte | Dallas | Fort Worth | Houston | New York | San Antonio | The Woodlands

2728 N. Harwood Street
Suite 500
Dallas, TX 75201
Tax I.D. #75-2404691

January 12, 2023

BEN HIDALGO
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE.
SUITE 401
FORT WORTH, TX 76110

Invoice #: 3175612
Client #: 55203
Matter #: 300

REMITTANCE ADVICE

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE

\$ 2,972.45

Please return this advice with payment to:

WINSTEAD PC | ATTORNEYS
ATTN: Accounts Receivable
2728 N. Harwood St., Suite 500
Dallas, Texas 75201-1743

Wire Transfer Instructions: Invoice Payments

JPMORGAN CHASE BANK, N.A.
Swift Code CHASUS33XXX
ABA# 111000614
Account # 729508785
Credit: Winstead PC
Cash Receipts Account
Reference: M. Kasey Ratliff
Client/Matter#: 55203.300

ACH TRANSFERS:

Must be sent in CTX Format with payment detail by invoice number.

Invoice payment detail may also be submitted via fax or email:

FAX: 214.745.5390
ATTN: Accounts Receivable
Email: accountsreceivable@winstead.com

TERMS: NET 30 DAYS

Thank you! Your Business is Greatly Appreciated.



2728 N. Harwood Street
Suite 500
Dallas, TX 75201
Tax I.D. #75-2404691

February 16, 2023

BEN HIDALGO
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE.
SUITE 401
FORT WORTH, TX 76110

Invoice #: 3183131
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through January 31, 2023:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
1/10/23	MKR	Correspondence with local counsel regarding revised draft of federal court complaint; review and revise draft Complaint; correspondence with Mr. Ledesma regarding same.	.80
1/11/23	MKR	Telephone conference with local counsel regarding revisions to draft Complaint; revise Complaint to reflect proper federal court allegations with respect to diversity of citizenship of client entity; various correspondence with Mr. Ledesma regarding same.	.90
1/11/23	MJ	Conference with local counsel regarding complaint.	.20
1/24/23	MKR	Various correspondence with local counsel regarding status of Complaint and service of same; correspondence with Mr. Ledesma providing update regarding same.	.20
1/26/23	MKR	Review correspondence from local counsel regarding Court's requirement of more specific allegations relating to citizenship of entities and individuals with ownership of Plaintiff; review General Order No. 157 regarding same; various correspondence with Mr. Ledesma regarding same; various correspondence with local counsel regarding same.	.80
1/27/23	MKR	Various correspondence with local counsel regarding pro hac vice admission.	.20
1/31/23	MKR	Correspondence with Mr. Ledesma regarding citizenship of various owners of Plaintiff for purposes of Court-required disclosure statement; analyze ownership of various relevant entities and revise corporate disclosure statement.	1.20

WINSTEAD PC | ATTORNEYS

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY)

February 16, 2023

Invoice #: 3183131

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	4.10	675.00	2,767.50
MJ	Matt Joeckel	.20	465.00	93.00
TOTALS		4.30		\$ 2,860.50

TOTAL PROFESSIONAL SERVICES \$ 2,860.50

Less 15% Discount \$ -429.08

NET PROFESSIONAL SERVICES: \$ 2,431.42

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	4.10	675.00	2,767.50
MJ	Matt Joeckel	.20	465.00	93.00
TOTALS		4.30		\$ 2,860.50

EXPENSES

	Description	Amount
1/27/23	Advance For Miscellaneous - M Ratliff - Miscellaneous - Other Certificate of Good Standing from Supreme Court of Texas for application to be admitted Pro Hac Vice in Western District of New York. - 01/27/2023	25.00

TOTAL EXPENSES \$ 25.00

TOTAL THIS INVOICE \$ 2,456.42



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February 16, 2023

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1000 FOREST PARK AVE.
SUITE 401
FORT WORTH, TX 76110Invoice #: 3183131
Client #: 55203
Matter #: 300**REMITTANCE ADVICE****RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)**

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE**\$ 2,456.42**

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Dallas, Texas 75201-1743**Wire Transfer Instructions: Invoice Payments**JPMORGAN CHASE BANK, N.A.
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Reference: M. Kasey Ratliff
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Email: accountsreceivable@winstead.com**TERMS: NET 30 DAYS*****Thank you! Your Business is Greatly Appreciated.***



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March 23, 2023

BEN HIDALGO
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE.
SUITE 401
FORT WORTH, TX 76110

Invoice #: 3192091
Client #: 55203
Matter #: 300

RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)

Billing Attorney: M. Kasey Ratliff

For Professional Services Rendered Through February 28, 2023:

PROFESSIONAL SERVICES

Date	Init	Description	Hours
2/01/23	MKR	Revise corporate disclosure statement; correspondence with Mr. Ledesma regarding same.	.20
2/02/23	MKR	Revise corporate disclosure statement; various correspondence with local counsel regarding same; review status of service of Plaintiff's Complaint.	.90
2/03/23	MKR	Various correspondence with local counsel regarding service of lawsuit on Defendant; calculate Defendant's deadline to file a responsive pleading; provide update to Mr. Ledesma regarding same.	.30
2/06/23	MKR	Various correspondence with local counsel and Mr. Ledesma regarding opposing counsel's settlement offer.	.20
2/24/23	MKR	Correspondence with opposing counsel regarding strategy for settlement and motion for default judgment against Defendant.	.20
2/28/23	MKR	Various correspondence with local counsel regarding settlement and motion for default; various telephone conferences with opposing counsel regarding settlement; correspondence to Mr. Ledesma providing update regarding same.	.50

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	2.30	675.00	1,552.50
TOTALS		2.30		\$ 1,552.50

Matter: 300 440 LAKE AVENUE, LLC (ROCHESTER, NY) March 23, 2023
Invoice #: 3192091

TOTAL PROFESSIONAL SERVICES \$ 1,552.50
Less 15% Discount \$ -232.88
NET PROFESSIONAL SERVICES: \$ 1,319.62

SUMMARY OF PROFESSIONAL SERVICES

Init	Timekeeper	Hours	Rate	Total
MKR	M. Kasey Ratliff	2.30	675.00	1,552.50
TOTALS		2.30		\$ 1,552.50

TOTAL THIS INVOICE \$ 1,319.62



Austin | Charlotte | Dallas | Fort Worth | Houston | New York | San Antonio | The Woodlands

2728 N. Harwood Street
Suite 500
Dallas, TX 75201
Tax I.D. #75-2404691

March 23, 2023

BEN HIDALGO
NET LEASE DEVELOPMENT, LLC
1000 FOREST PARK AVE.
SUITE 401
FORT WORTH, TX 76110Invoice #: 3192091
Client #: 55203
Matter #: 300**REMITTANCE ADVICE****RE: 440 LAKE AVENUE, LLC (ROCHESTER, NY)**

Billing Attorney: M. Kasey Ratliff

BALANCE DUE THIS INVOICE**\$ 1,319.62**

Please return this advice with payment to:

WINSTEAD PC | ATTORNEYS
ATTN: Accounts Receivable
2728 N. Harwood St., Suite 500
Dallas, Texas 75201-1743**Wire Transfer Instructions: Invoice Payments**JPMORGAN CHASE BANK, N.A.
Swift Code CHASUS33XXX
ABA# 111000614
Account # 729508785
Credit: Winstead PC
Cash Receipts Account
Reference: M. Kasey Ratliff
Client/Matter#: 55203.300**ACH TRANSFERS:**Must be sent in CTX Format with payment
detail by invoice number.Invoice payment detail may also be
submitted via fax or email:FAX: 214.745.5390
ATTN: Accounts Receivable
Email: accountsreceivable@winstead.com**TERMS: NET 30 DAYS*****Thank you! Your Business is Greatly Appreciated.***